

EXHIBIT B

RENAISSANCE TECHNOLOGIES LLC

CODE OF ETHICS

and

COMPLIANCE MANUAL

February 1, 2012

as last amended February 1, 2017

- Illinois (including spouse and minor children) [Chairman of the Board only]
- Maryland
- New Jersey (including spouse)
- New Mexico
- Pennsylvania (including immediate family)
- Texas (excluding family members, except in Dallas)
- Vermont
- Virginia

Notification Jurisdictions

Notification is required in the following jurisdictions:

- Denver, Colorado (including spouse)
- Illinois (state and local)
- Detroit, Michigan (including spouse)

• Communications with Media, Regulators, Clients and Investors

Law and Policy

Communications with media and regulators are governed by Firm policy intended to minimize risk resulting from inappropriate disclosures or public statements. In addition, individuals who make false statements to government regulators are subject to criminal liability.

Communications with Clients and investors are also governed by Section 206 and Rule 206(4)-8 of the Advisers Act. Rule 206(4)-8 makes it a fraudulent practice for any investment adviser to make a material misstatement in or omission from any communication with an investor or prospective investor in a pooled investment vehicle.

Media Relations. It is the Firm's general policy that no communications with the press or other news media should take place without the approval of the Chief Compliance Officer or the General Counsel. This prohibition includes, but is not limited to, interviews by print or electronic media, appearances on national network, local or cable television broadcasts and written investment-related articles for publication.

If the purpose of the communication with the media is to promote the business of the Firm, such activities may be considered advertising under the various securities laws. Accordingly, a copy of any prepared comments, script or text should be forwarded to the Chief Compliance Officer for prior review. All inquiries from the media must be referred to the Chief Compliance Officer or the Chief Operating Officer for a response.

Regulatory Inquiries, Client Complaints and Other Matters. It is the Firm's policy that all regulatory inquiries, Client/investor complaints and legal matters concerning the Firm be handled by the Chief Compliance Officer or the General Counsel. Employees receiving such inquiries should refer them immediately to the Chief Compliance Officer or the General Counsel.

Regulatory inquiries may be received by mail, telephone or personal visit. In the case of a personal visit, demand may be made for the immediate production or inspection of documents. While any telephone or personal inquiry should be handled in a courteous manner, the caller or visitor should

be informed that a response requires the approval of the Firm's Chief Compliance Officer or the General Counsel, and that any subsequent inquiries should be made to the Chief Compliance Officer or the General Counsel. Letter inquiries should be forwarded to the Chief Compliance Officer or General Counsel. Under no circumstances should any documents or material be released without prior approval of the Chief Compliance Officer or the General Counsel, nor should any Employee have substantive discussions with any regulatory personnel without prior consultation with the Chief Compliance Officer or the General Counsel.

•Communications with Media, Regulators, Clients and Investors Procedures

Communications with the Media. The following procedures apply to all communications with the media:

- All media calls or queries must be referred immediately to the Chief Compliance Officer or Chief Operating Officer.
- All inquiries from the press and any unsolicited inquiry concerning any fund presently offered and advised by the Firm (including to confirm information about the fund) should be referred to the Chief Compliance Officer or General Counsel.
- Any personal or family relationships with a member of the media should be made known to the Chief Compliance Officer or General Counsel. Members of the media are not invited as reporters to Firm events. This fact should be made clear to any person who might be invited to a Firm event based on a personal relationship with an Employee.
- An Employee who wishes to publish an article, paper or other publication (including in any electronic media, such as a blog, webcast or social networking website), appear in public, speak on behalf of, or represent the Firm must receive prior written approval from the Chief Compliance Officer or General Counsel.

Regulatory Inquiries. All regulatory inquiries concerning the Firm are handled by the Chief Compliance Officer or General Counsel. Employees receiving such inquiries, whether by mail, telephone or personal visit, must refer them immediately to the Chief Compliance Officer or General Counsel. Under no circumstances should any documents or material be released without prior approval of the Chief Compliance Officer or General Counsel, nor should any Employee have substantive discussions with any regulatory personnel without prior consultation with the Chief Compliance Officer or General Counsel. The Chief Compliance Officer will maintain records of any inquiries and accompanying responses.

Communications with Investors or Prospective Investors. All communications with investors or prospective investors, including private placement memoranda, forms of investor reports, or responses to "requests for proposals" must be pre-approved by the Chief Compliance Officer.

Client Complaints. Any Employee receiving a complaint, whether oral or written, from any Client or from any investor in a private fund or account managed by the Firm must promptly bring such complaint to the attention of the Chief Compliance Officer or General Counsel. Employees should not attempt to respond to or resolve any complaint by themselves. All responses to such complaints must be handled by the Chief Compliance Officer or General Counsel. The Chief Compliance Officer will maintain records of any complaints and accompanying responses.